

**EXHIBIT “B”**

**COMPLAINT TO MR. JAMES M. PECK, C.E.O.**

17CVI 0005

CLEVELAND MUNICIPAL COURT  
Cuyahoga County, OH  
Earle B. Turner, Clerk of Court  
Small Claims Division

FILED

2017 JAN -3 A 9 10

State of Ohio } SS.  
County of Cuyahoga }

CLEVELAND MUNICIPAL COURT  
EARLE B. TURNER  
CLERK OF COURTS  
#8

Phillip Robinson  
1278 West 9th #329  
Cleveland OH 44113

Plaintiff

Phillip Robinson  
1278 West 9th #329  
Cleveland OH 44113

Plaintiff

-vs-

Complaint for Money Only

Mr. James M. Peck C.E.O.  
555 W. Adams St FL 2-9  
Chicago, IL 60661  
Trans Union C.E.O.,  
Defendant

Mr. James M. Peck C.E.O.  
555 W. Adams St FL 2-9  
Chicago, IL 60661  
Defendant

STATEMENT OF CLAIM

I am suing C.E.O. Mr. James Peck for negligence and willful failure to reinvestigate the disputed entries on my credit report in violation of Sections 611(a), 616 and 617 of the FCRA, 15 U.S.C. 1681i(a) 1681n, 1681o

- 1) Defamation
- 2) Negligent Enablement of identity Fraud
- 3) Violation of the Fair Credit Reporting act

Wherefore, plaintiff prays judgment against defendant in the sum of \$ 3000.00 plus interest from the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at the rate of \_\_\_\_\_ %, together with costs of this action.

Phillip Robinson  
Plaintiff

\_\_\_\_\_  
Attorney for Plaintiff

(Must submit military affidavit with each filing)

STATE OF OHIO

COUNTY OF CUYAHOGA

} SS:

AFFIDAVIT

Phillip Robinson, being first duly sworn, under oath states that affiant is the Plaintiff / Attorney for the Plaintiff in this cause of action and that this cause of action is for money only in the amount and for reasons as stated in Plaintiff's petition and that to the best of affiant's knowledge:

- ☐ I am unable to determine whether or not the defendant(s) is / are in the military service.
- ☐ The defendant(s) is / are currently in the military service.
- ☒ The defendant(s) is / are NOT currently in the military service.

I know the military status of the defendant because: He is currently the  
C.E.O. of Transunion

FURTHER AFFIANT SAYETH NAUGHT

  
Affiant

SWORN TO BEFORE ME and subscribed in my presence on this 3rd day of  
January, 2017.

  
Notary Public

My Commission expires 8/26/20